

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

Jerry Rodriguez, on behalf of himself
and others similarly situated,

Plaintiff,

v.

Remy Coeytaux,

Defendant.

Case No. 3:25-cv-225

**JOINT MOTION TO STAY DEFENDANT'S DEADLINE TO
ANSWER PLAINTIFF'S COMPLAINT**

The defendant's deadline to answer the plaintiff's complaint is currently set for Monday, October 6, 2025. The parties jointly and respectfully move to stay the defendant's deadline to file his answer or motion to dismiss.

The parties are making this request because the plaintiff intends to amend his complaint in response to Texas's House Bill 7, which takes effect on December 4, 2025. It would therefore serve judicial economy for the Court to stay the defendant's deadline to file an answer or motion to dismiss until after the plaintiff amends his complaint in December of 2025, when Texas's House Bill 7 takes effect. The parties respectfully request that the Court postpone the defendant's deadline to file his answer or motion to dismiss until 30 days after the amended complaint is filed in December of 2025. A proposed order is attached.

Respectfully submitted.

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Attorney-in-Charge
Texas Bar No. 24075463
S.D. Tex. Bar No. 1133287
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

Counsel for Plaintiff and Proposed Class

Dated: September 29, 2025

/s/ Christopher M. Odell
CHRISTOPHER M. ODELL
Attorney-in-Charge
Texas State Bar No. 24037205
S.D. Tex. Bar No. 33677
LEAH SCHULTZ
Texas State Bar No. 24126910
S.D. Tex. Bar No. 3737066
Arnold & Porter Kaye Scholer LLP
700 Louisiana Street, Suite 4000
Houston, TX 77002-2755
(713) 576-2400 (phone)
(713) 576-2499 (fax)
christopher.odell@arnoldporter.com
leah.schultz@arnoldporter.com

MARC HEARRON*
Center for Reproductive Rights
Texas Bar No. 2450739
199 Water Street, 22nd Floor
New York, New York 10038
(917) 637-3600 (phone)
(917) 637-3666 (fax)
mhearron@reprorights.org

JENNA HUDSON*
Center for Reproductive Rights
District of Columbia Bar No. 1002396
1600 K Street NW
Washington, DC 20002
(202) 628 -0286 (phone)
jhudson@reprorights.org

* admitted pro hac vice

Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on September 29, 2025, I served this document through CM/ECF upon:

CHRISTOPHER M. ODELL
LEAH SCHULTZ
Arnold & Porter Kaye Scholer LLP
700 Louisiana Street, Suite 4000
Houston, Texas 77002-2755
(713) 576-2400 (phone)
(713) 576-2499 (fax)
christopher.odell@arnoldporter.com
leah.schultz@arnoldporter.com

MARC HEARRON
Center for Reproductive Rights
199 Water Street, 22nd Floor
New York, New York 10038
(917) 637-3600 (phone)
(917) 637-3666 (fax)
mhearron@reprorights.org

JENNA HUDSON
Center for Reproductive Rights
1600 K Street NW
Washington, DC 20002
(202) 628-0286 (phone)
jhudson@reprorights.org

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Counsel for Plaintiff